

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Alexandra A.E. Shapiro, defendant Douglas Whitman hereby moves this Court, before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, pursuant to 28 U.S.C. § 2255 for an order vacating his conviction and sentence, and awarding such other and further relief as the Court deems just and proper. The Court previously set April 15, 2015 as the deadline for the government's response, and April 22, 2015 as the deadline for Mr. Whitman's reply.

Dated: New York, New York  
March 25, 2015

Respectfully submitted,

By: s/ Alexandra A.E. Shapiro  
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